

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN MEMPHIS

Arthur Jones  
4431 Old Quarry Rd  
Memphis, TN 38118  
(Name of plaintiff or plaintiffs)

CIVIL ACTION NO. \_\_\_\_\_

Arthur Jones v. T.D. OS  
Tennessee Department  
of Safety

\_\_\_\_\_  
(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Arthur Jones  
(name of plaintiff)

is a citizen of the United States and resides at Rte 3 Box 216 Collier Ville, TN  
(street address)

Collier Ville, Shelby MS  
(city) (country) (state)

38107  
(zip code) (telephone number)

3. Defendant Tennessee Department of safety  
 (defendant's name)  
 lives at, or its business is located at 1150 Foster Avenue  
 (street address)  
Nashville, Tennessee

4. Plaintiff sought employment from the defendant or was employed by the defendant at  
July 2002 - Dec 9, 2009 1150 Foster Ave  
 (street address)  
Nashville, TN Davidson TN 37120  
 (city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 10/1/2010  
 (day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 10/1/2010 - 5/1/2013  
 (day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 9/11/2014. (Attach a copy of the notice to this complaint.)  
 (day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) \_\_\_ color, (3) \_\_\_ sex, (4) \_\_\_ religion, (5) \_\_\_ national origin, defendant (And age

(a) ☒ failed to employ plaintiff.

(b) \_\_\_ terminated plaintiff's employment.

(c) \_\_\_ failed to promote plaintiff.

(d) I Left position As Trooper Was told I would have a letter of Rehire and tried to go back to the Dept within a year and was not Accepted Back By the Depart ment. I had to take a physical And Physiological Test I Passed the physical. The physcialigist Reom Recommended that I Not Be Rehired. In order to get the Job with Memphis City School I had to Be Examined BY

10. The circumstances under which defendant discriminated against plaintiff were as follows: I was given a letter that stated I would be able to return to the position as Trooper. I re applied for my job in a timely manner. I was sent a physical agility appoiat. And Interview. on 11/14/2012. I got through physical agality and was given an Interview by a team of Troopers. And I was to be Notified of the Next process of Getting to My Job Back. I was Notified later from the Dept of Safety about the Class. the Original Class started in the month of March 2013 And I was Notified By E-Mail in April 2014. also I was 49 year old and feel my age played a part in Me Not being Rehired, Was Never compensated for Associate Police Science Degree never promoted.

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_\_ are still being committed by defendant.
- (b) \_\_\_\_ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_\_ Defendant be directed to employ plaintiff, or
- (b) \_\_\_\_ Defendant be directed to re-employ plaintiff, or
- (c) \_\_\_\_ Defendant be directed to promote plaintiff, or;
- (d) \_\_\_\_ Defendant be directed to Compensate Me for the time lost from my former position AS A Tennessee STATE Trooper

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ) No (☒)

Arthur Jones  
SIGNATURE OF PLAINTIFF